



Tulchin, Matt

From: Soren Young <soren.young@nelsonmullins.com>
Sent: Friday, December 20, 2024 5:54 PM
To: Rodriguez, Orlando; Tulchin, Matt
Cc: Rob Lindholm; Matthew Lindenbaum; Jenni Jokerst; Duprey, Michelle
Subject: Doe 1, et al. v. NCDPS, et al. - Document Productions Regarding Third-Party Inspections

Orlando,

I'm writing about the completeness of Defendants' document production in response to Plaintiffs' Requests for Production 18 and 54, which seek, among other things, all documents and communications relating to any inspections of Juvenile Detention Centers. We understand that Disability Rights North Carolina inspected the Cabarrus, Dillon, Wake, and Pitt JDCs after January 1, 2022 and issued reports to NCDPS regarding those inspections. Although NCDPS has produced three such reports, NCDPS has not produced a report regarding the February 2024 inspection of the Cabarrus JDC, the April 2024 inspection of the Dillon JDC, or any reports regarding inspections of the Pitt JDC. Please produce any outstanding reports/memoranda or confirm that NCDPS does not possess any additional reports/memoranda issued by Disability Rights North Carolina regarding its inspection of JDCs.

Requests 18 and 54 also seek NCDPS's communications with third parties regarding inspections of JDCs. Defendants have produced only seven emails between NCDPS and Disability Rights North Carolina. Please produce all remaining communications with Disability Rights North Carolina regarding its inspections of JDCs or confirm that no additional communications exist.

Best,
Soren



SOREN YOUNG ASSOCIATE
soren.young@nelsonmullins.com
MERIDIAN | 17TH FLOOR
1320 MAIN STREET | COLUMBIA, SC 29201
T 803.255.9729 F 803.256.7500
NELSONMULLINS.COM VCARD VIEW BIO

Confidentiality Notice

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone (800-237-2000) or reply to this e-mail and delete all copies of this message.